

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	Criminal No. 1:18-cr-00083-TSE
v.)	
)	
PAUL J. MANAFORT, JR.,)	
)	Judge T. S. Ellis, III
Defendant.)	

**PAUL J. MANAFORT, JR.'S MEMORANDUM IN SUPPORT OF MOTION TO SEAL
CERTAIN PORTIONS OF AUGUST 7, 2018 SIDEBAR CONFERENCE**

Paul J. Manafort, Jr., by and through counsel, hereby submits this memorandum in support of his motion to seal pursuant to Local Criminal Rule 49(E).

On August 9, 2018, the Court granted the Government's motion to seal certain portions of a sidebar conference conducted on August 7, 2018. (Doc. 221). The Court granted the Government's motion with regard to the following portions of the sidebar conference: Aug. 7, 2018 Tr. at 1399:14-19; 1402:1-2, 14-17; and 1403:12-15. Mr. Manafort submits that the following additional portions of the sidebar conference should also be sealed because these portions relate to the same discussion as the portions described above that remain under seal: Aug. 7, 2018 Tr. at 1399:23-25 – 1400:1-4; 1400:9-16; 1401:8-11; and 1402:8-10. More specifically, these portions of the record should remain under seal because they similarly refer to an ongoing federal investigation.

WHEREFORE, Mr. Manafort respectfully requests that the portions of the August 7, 2018 sidebar conference identified above remain under seal until the Government's ongoing investigation is publicly revealed.

Dated: August 21, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of August 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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